MARC RACICOT
GOVERNOR

MONTANA
DEPARTMENT OF AGRICULTURE

OFFICE OF THE DIRECTOR
303 N ROBERTS, PO BOX 200201
HELENA, MT 59620-0201

W. RALPH PECK
DIRECTOR
(406) 444-3144

FAX (406) 444-5409
TDD (406) 444-4687
INTERNET AGR@MT.GOV

January 18, 2000

Senator William Crismore
Chairman EQC
Land Use/Environmental Trends Subcommittee
P. O. Box 201704
Helena, MT 59620-1704

Dear Senator Crismore:

This letter is in response to your request from the EQC to gather, analyze, and interpret timely and authoritative information about the condition and trends in the quality of Montana's environment.

In response to questions one and two, the Montana Agricultural Statistic Service gathers information about agriculture in Montana on an annual basis. The facts and figures include: land ownership, number of farms, land in farms, average size of farms, types of crops with acreage, yield and production, irrigated vs. non-irrigated crops, number of cattle and calves, number of sheep and lambs, number of hogs and pigs, number of chickens, prices received, etc.

If you look at the percent of change in the various parameters over time, you can definitely see some trends. You can see such things as a decrease in the number of farms, decrease in the average size of farms, decrease in the number of large farms and an increase in the number of irrigated acres. But, what does this mean in terms of the overall quality of the agricultural environment in Montana? Because of some low commodity prices in recent years, we have said that generally the agricultural economy is down. Therefore, considering the various factors, the agricultural picture may look good in the Kalispell area, but not so rosy in the Miles City area. The point is that while trend data may be helpful in looking at state or county data, or a specific area of the state the trends may be overshadowed by averages from other geographic locations.

The two programs that were identified in the Compliance and Enforcement Report were the Pesticide Program and the Ground Water Program.

The ground water program established monitoring wells in major crop production areas (irrigated and non-irrigated small grains, irrigated sugar beets, irrigated seed potatoes and corn) in the early 90's. The purpose was to monitor the ground water for the specific pesticides used in these crops. We have recognized from the beginning that:

1) we do not have enough wells per crop type to account for different soil types and different depth aquifers that may be present, and

2) the results of our sampling may not be indicative of what is happening in the same crop type in a different area of the state (from where the well was located).

In most counties in the state, we have sampled shallow wells to determine the presence or absence of pesticide residues. To date, most pesticide detection's have been well below the MCL's (maximum containment level) or HA's (health advisory) levels and present no immediate drinking water health risk. The Ground Water Information Center (GWIC) indicates they have records for approximately 140,000 wells in Montana (1996). Therefore, the few hundred wells we have sampled do not represent a large enough sample size to use as trend information. Infusion of dollars and manpower may or may not resolve this problem. For some areas of the state, we probably have enough wells sampled several times a year over a period of years to be able to predict future trends. However, this data would only be valid for that particular area and could not be used to predict statewide trends.

The following data is being maintained for pesticide enforcement files: type of pesticide involved, areas of the environment affected (i.e. water, air, crops, soils, etc.), the degree of impact to the environment, and whether human health was affected. These records are in addition to standard enforcement data such as the individuals involved, dates, sample results, laws violated, enforcement actions, etc. This data has limited value in terms of defining county or state environmental trends. It is collected during routine inspections and investigations, and is not representative of environmental conditions within a large area or county. The data is valuable in identifying <u>regulatory</u> trends. Recognizing its limitations of defining environmental trends.

The department's analytical laboratory has the capability to analyze environmental samples for pesticides and other chemicals. In the past, the department analyzed market samples of foods and

commodities samples to determine pesticide residues. At this time, the department has not seen a need to continue this monitoring because pesticide residue monitoring is conducted for foods and commodities by the U.S. Food and Drug Administration and by the United States Department of Agriculture.

In answer to question three of your memorandum, due to workload demands, resource and funding restrictions, we are hesitant at this time to recommend that a description of environmental conditions and trends be incorporated into the biennial compliance and enforcement report. Based on our review of MLA, the report requirements in 75-1-314, MCA do not seem to include environmental conditions and trends, but seem to request enforcement trends. The department's legislative authority or funding to collect the types of environmental data that are needed may need more clarification. It seems appropriate to assess the types of data needed and our responsibilities and the financial resources necessary to collect and report such data.

Regarding our recommendation for documenting the physical conditions and trends in Montana's environmental resources, (question four of your memorandum), we see the value in this information. Montana Agricultural Statistics published yearly provides comprehensive trend information about crop and livestock production in Montana. If further environmental data is needed regarding our programs, we are prepared to work with you to properly define the department of agriculture's role in collecting and correlating this information.

Sincerely,

Ralph Peck

Ralph Peck,
Director

Encl.

m:\asd\adm\nco